



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

Northwest Regional Office, 3190 - 160th Ave. S.E. • Bellevue, Washington 98008-5452 • (206) 649-7000

April 28, 1994

**CERTIFIED MAIL**  
P 311 404 005

Ms. Julie Slocum  
Burlington Environmental Inc.  
Waterfront Place One, Suite 700  
1011 Western Avenue  
Seattle, WA 98104

Dear Ms. Slocum:

Re: Interim Status Closure Plan for the Burlington Environmental  
Inc. facility at Pier 91, WAD000812917

This correspondence is in response to the revised Interim Status  
Closure Plan submitted to the Department of Ecology (Ecology)  
dated September 13, 1993.

In summary, Ecology has determined that the closure plan needs  
further revision before it can be public noticed and approved for  
implementation. Many of the deficiencies listed in the June 14,  
1993 notice of deficiency correspondence have been addressed by  
Burlington Environmental Inc. (Burlington). However, additional  
information, clarification and corrections are necessary in order  
to fulfill the closure regulations under WAC 173-303-400 and by  
reference 40 CFR Part 265. The discussion of the individual tank  
usage is confusing and lacks the necessary detail required. The  
specific deficiencies should be addressed by written comments as  
well as actual changes in the closure plan.

Specific comments are attached that address the deficiencies.  
Please make the appropriate revisions to the closure plan and  
then re-submit to Ecology within 45 days of your receipt of this  
letter.

Once the closure plan deficiencies are corrected, Ecology will  
public notice the closure plan as submitted. At the end of the  
public notice comment period, the closure plan could be modified  
with conditions attached to its approval by Ecology (40 CFR  
265(d)(4)) before the closure plan is approved for implementation  
by Burlington.

WAD 2917

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RCRA PERMITS SECTION

USEPA RCRA

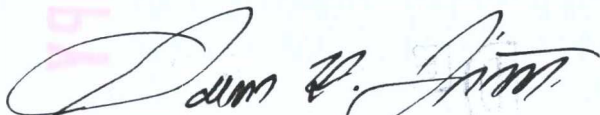


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Ms. Julie Slocum  
Page 2  
April 28, 1994

If you have any questions or comments regarding these matters,  
please contact me at (206) 649-7280.

Sincerely,

A handwritten signature in dark ink, appearing to read "Galen H. Tritt". The signature is fluid and cursive, with the first name "Galen" being more prominent.

Galen H. Tritt  
Hazardous Waste Specialist, NWRO

cc: Mike Torpy, PANOCO  
Doug Hotchkiss, Port of Seattle  
David Croxton, EPA-X  
Julie Sellick, WDOE-NWRO  
D. Hideo Fujita, P.E., WDOE-NWRO  
Jeannie Summerhays, WDOE-NWRO  
Gerald Lenssen, WDOE-HQ  
File HZW 5.1

BURLINGTON ENVIRONMENTAL INC.  
PIER 91 FACILITY  
RCRA Interim Status Closure Plan  
April 28, 1994

COMMENTS ON EXISTING CLOSURE PLAN and REVISIONS REQUIRED

**1.2 Closure Performance Standards**

This section addresses the closure standards for all the above ground portions of the facility undergoing interim status closure. Additional information and clarification is required.

- 1) Provide an updated Figure 1.0 that identifies the location of the former "Rec Tank", the Container Storage Unit located within the Warehouse and the "Baker tanks" (L, M, and E).
- 2) Provide an additional figure and text that identifies any piping and ancillary equipment that were used for the interim status areas of the facility that will be closed. This should include identification of piping in service, out of service, above ground and underground. If any of the ancillary equipment has been decontaminated, it should be clearly stated. The statement "it is common practice during decontaminating to flush the piping and pumps involved as well", does not accurately state whether or not the ancillary equipment was decontaminated.

**2.0 Tank Histories and Rationale for Closure of Units**

This section does not have complete information on the history of all the tanks units.

- 3) Provide a summary table that identifies the tanks that were decontaminated similar to the one submitted in the original interim status closure plan (Table 1.0). This should include prior usage, date of decontamination and present usage.
- 4) Provide additional information on the "Rec Tank" identified in the RFA and on Baker tanks L, M, and E. This should include a history of the tanks' usage, location, decontamination, and removal. Provide any plans for decontamination of the concrete pads where they were located or documentation that this has already been completed.

**2.1 Product Storage Tanks in PANOCO Service**

**a. Tanks 91, 92, 93, 101, 102, 103, and 104**

This section and Appendix 1 are deficient and sometimes conflicting. If these tanks are to be closed administratively under interim status, sufficient documentation of non-hazardous waste usage must be provided for each year that the tanks have been in service.



A copy of the Boeing rental agreement should also be provided in the appendix, with dates and terms of the agreement. A description of the tank contents while leased to Boeing is also necessary. Burlington is responsible for determining if Boeing ever used these tanks for storage of hazardous waste.

- 5) Provide information on Tank 91 for 1971 to December 1973.
- 6) Provide information on Tank 92 for 1971 to August 1972.
- 7) Provide information on Tank 93 for 1971 to September 1973.
- 8) Provide information on Tank 101 for 1971 to December 1973.
- 9) Provide information on Tank 102 for 1971 to December 1973.
- 10) Provide information on Tank 103 for 1971 to June 1973.
- 11) Provide information on Tank 104 for 1971 to September 1973, and for September 1973 to March 1975.
- 12) Provide information on Tank 95 from 1971 to September 1973, and for October 1977 to March 1980.
- 13) Provide information on Tank 113 from 1971 to August 1973, and September 1973 to May 1975.

2.2 Decontaminated Tanks Currently in Non-Dangerous Waste Service  
**a. Tanks 94, 96, 97, 98, 100, 105, 106, 107, 108, and 114**

Burlington requests that these tanks be administratively closed within this section. These tanks have also been reportedly decontaminated in 1989 and 1990.

- 14) Has Burlington ever used these tanks as hazardous waste storage tanks prior to their decontamination?
- 15) Provide information on Tank 94 from 1981 to the present.
- 16) Provide information on Tank 96 from 1971 to December 1972, January 1973 to September 1980, and January 1981 to the present.
- 17) Provide information on Tank 97 from 1971 to 1980, and from January 1982 to the present.
- 18) Provide information on Tank 98 from 1971 to December 1973, from February 1975 to January 1980, and from August 1981 to the present.

- 19) Provide information on Tank 100 from 1971 to December 1973, for November 1976 to March 1980, and for December 1981 to the present.
- 20) Provide information on Tank 114 from 1971 to July 1973, and for July 1981 to the present.

**b. Tanks 90 and 99**

Burlington states that "these tanks at no point in time held or were used to manage dangerous wastes". The information given in Appendix 1 does not support this. According to the information you provided, Tank 90 stored solvents on four dates; April 1975, June 1975, June 1977 and January 1980.

- 21) Provide the necessary changes in the closure plan to clear up the discrepancy in the information for Tank 90. Also provide content information from December 1981 to the present.
- 22) Provide information on Tank 99 from 1971 to December 1973, for 1975 and 1979, and from October 1981 to the present.

Burlington states that "final closure of Tanks 105 through 108 is addressed in the approved Part B Closure Plan and, thus, is not discussed here". Conflicting statements are made within the same paragraph that ask for administrative closure of these tanks. You have also stated that these tanks were decontaminated in 1989 and 1990. The information I have in the Part B, shows that only Tanks 105 and 107 are included, and that they are listed as **regulated** tanks. Tanks 106 and 108 do not exist in the Part B permit, as they are replaced by **proposed tanks 2702 and 2704**. Please clarify!

The main issues for these tanks:

- o Will Tanks 105 and 107 be used for regulated or non-regulated materials under the Part B permit?
- o If the tanks will be used for non-regulated waste, they must be included in the interim status closure plan.
- o Tanks 106 and 108 will need to be included in the interim status closure plan since they are not included in the Part B permit. Information on when these tanks will be removed should be included.



2.3 Out-of-Service Tanks Requiring Decontamination

a. Tanks 115, 116, 117, 118, and 165

Burlington removed these tanks from service in 1989, but they still require decontamination. You state that the reason the tanks were not closed earlier as required by 40 CFR 265, was the closure plan had not been approved. I am unable to locate any notification from Burlington in the Ecology files that Burlington planned to close these tanks. Nothing in the files indicates a closure plan was submitted in order for closure to proceed according to 40 CFR 265.113(a).

- 23) Provide documentation that within the years 1989 or 1990, Burlington submitted to Ecology an interim status closure plan for "approval" and notification of the need to clean close these tanks.

**4.0 CLOSURE SCHEDULE**

Within this section Burlington references the current lease arrangements and the restrictions on removing the tanks or tank pads prior to final closure. The lease has been restructured since the closure plan was submitted.

- 24) Provide either a copy of the current lease agreement with the Port of Seattle or a copy of the portions of the lease that apply to closure and corrective action.

**5.0 CLOSURE ACTIVITIES**

On page 13 under section 5.3 decontamination procedures, you state that "written proof of decontamination will be obtained from the independent, registered, professional engineer and/or a marine chemist". Under the regulations in 40 CFR 265.115 only a engineer will be acceptable. You can use a marine chemist in addition but not as a substitute.

- 25) Provide revisions within the closure plan to reflect the certification by an "independent registered professional engineer" and by the "owner or operator".

**Section 5.4** discusses the sampling plan for the containment pads.

- 26) Locations for sampling should be identified on a figure.
- 27) A final submittal of the findings will need to be sent to Ecology, prior to acceptance of the closure certification. Provide information within the closure plan for this submittal.

- 28) Samples to be analyzed for volatile compounds should not be ground to pass through a number 4 sieve. These samples should left in up to 2 cm pieces, and extracted in solution overnight.
- 29) Provide a table of constituents and analytical methods that will be used for each area to be sampled.
- 30) Supply a QA/QC plan along with expected detection limits from the analytical laboratory. The PQLs must be at an acceptable level in order to detect any residual contamination.

#### 6.0 POST-CLOSURE PLAN

This section is not accurate. The necessity for a post-closure permit has not been determined. Until corrective action is complete, it will not be known whether the facility will need to close as a landfill.

- 31) Provide a contingency for a post-closure plan based on the outcome of corrective action at the facility.

#### ADDITIONAL DEFICIENCIES

- 32) Provide a copy of any pre-1978 sublease agreements between BEI (Chempro) and PANOCO as an additional appendix to the closure plan.
- 33) Provide the existing schedule for tank integrity inspections for all existing tanks and clarify which tanks are not on a schedule. This can be submitted as a separate item, not necessarily as an attachment to the revised closure plan.
- 34) The tank decontamination certification forms signed by Nathan Mathews in Appendix 4 do not have an exact date. Clarify whether the forms were signed at time of tank decontamination or on another date.
- 35) Within the RFA, the warehouse had an approximate 200 square foot area that was used to store hazardous waste containers for greater than 90 days. This area will need to undergo clean closure and be included within the this interim status closure plan. Provide the necessary information, closure cost estimates, etc..

Pier 91 Facility

Page 6

April 28, 1994

- 36) The Pit separator was identified within the closure plan. Although it is not considered a regulated unit and not subject to being included in the closure plan, it is considered a SWMU and when it is removed will need to meet the same performance standards. Clarify whether Burlington intends to remove this unit at this time.
- 37) Within the closure plan Burlington states that some of the tanks were certified by an independent registered professional engineer. These certifications were for tank integrity, but not for certification of clean closure according to an approved closure plan. Provide clarification through out the affected sections since these two types of certification are different.